

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EMOJI COMPANY GmbH,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A HERETO,

Defendants.

Case No. 21-cv-1739

Judge

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff EMOJI COMPANY GmbH (“Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Plaintiff’s Schedule A attached to the Complaint, which identifies and includes a list of the Defendant Domain Names, domain name registration information, and Online Marketplace Accounts and (2) screenshot printouts showing the active Defendant Internet Stores (Exhibit 2 to the Declaration of Anna K. Reiter).

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark counterfeiting. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the Temporary Restraining Order has been served on the

relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Respectfully submitted,

Dated: March 31, 2021

By: s/Michael A. Hierl
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EMOJI COMPANY GmbH

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion for Leave to File Under Seal was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on March 31, 2021.

s/Michael A. Hierl